

REQUIRED STATEMENT TO ACCOMPANY  
ALL MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) Heidi Brown-Polk Case No. 19-02277 Chapter 13

Select Portfolio Servicing, Inc. as servicing agent for Deutsche Bank National Trust Company, as Trustee, in trust for registered Holders of Long Beach Mortgage Loan Trust 2006-WL2, Asset-Backed Certificates, Series 2006-WL2

All Cases: Moving Creditor	Mortgage Loan Trust 2006-WL2, Asset-Backed Certificates, Series 2006-WL2	Date Case Filed	01/27/2019
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Nature of Relief Sought:      ☒ Lift Stay      ☐ Annul Stay      ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ Or Date Plan Confirmed 06/17/2019

Chapter 7:      ☐ No-Asset Report Filed on \_\_\_\_\_

☐ No-Asset Report not filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

- a. ☒ Home
- b. ☐ Car Year, Make, and Model \_\_\_\_\_
- c. ☐ Other (describe) \_\_\_\_\_

2. Balanced Owed as of October 18, 2019 \$333,370.66, principal balance, \$386,446.97 payoff balance

Total of all other Liens against Collateral	\$	
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In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:

Attached as Exhibit E

4. Estimated Value of Collateral (must be supplied in *all* cases) \$250,000.00 based on debtor schedule A/B

## 5. Default

- a. ☐ Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
- b. ☒ Post-Petition Default
- i. ☒ On direct payments to the moving creditor  
Number of months 9 Amount \$12,920.85
- ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of Months \_\_\_\_\_ Amount \$ through \_\_\_\_\_

## 6. Other Allegations

- a. ☐ Lack of Adequate Protection § 362(d)(1)
- i. ☐ No insurance
- ii. ☐ Taxes unpaid                      Amount                      \$ \_\_\_\_\_
- iii. ☐ Rapidly depreciating asset
- iv. ☐ Other (describe)

- b. ☐ No Equity and not Necessary for an Effective reorganization § 362(d)(2)

- c. ☐ Other “Cause” § 362(d)(1)
- i. ☐ Bad Faith (describe) \_\_\_\_\_
- ii. ☐ Multiple Filings
- iii. ☐ Other (describe)

- d. Debtor's Statement of Intention regarding the Collateral
- i. ☐ Reaffirm    ii. ☐ Redeem    iii. ☐ Surrender    iv. ☒ No Statement of Intention Filed

Date: 10/30/2019 /s/ Josephine J. Miceli

Counsel for Movant